

IN THE UNITED STATES BANKRUPTCY COURT FOR
THE DISTRICT OF PUERTO RICO

| | | |
|----------------------------|---|--------------------------|
| IN RE: | * | CASE NO.: 09-08451 (SEK) |
| | * | |
| Luis A. Valcarcel Figueroa | * | CHAPTER 13 |
| | * | |
| Debtor (s) | * | |
| ***** | | |

APPLICATION FOR PAYMENT OF ATTORNEYS FEES

TO THE HONORABLE COURT:

Comes now counsel for debtor and very respectfully States, Alleges and Prays:

1. The present case was filed on October 2009, the 341 meeting was held on November 17 2009.

2. The debtor has moved this Court for a conversion to chapter 7 on May 20 2010. This motion is filed as our application to obtain attorneys fees, detailing the services and the time spent dealing with debtors chapter 13 bankruptcy. It details the date, the services provided and time spent:

- | | |
|--|----------|
| a. 12/16/09- filed a response to trustees objection to exemptions | 2 hrs. |
| under 522 D (1).docket 16. | |
| b. 12/ 18/09 filed amended schedule C to provide update on exemption of house. | |
| | 4/10 hr |
| c. 12/18/09 amended schedule A to provide updated value of house | 4/10. |
| d. 12/23/09 attended hearing to consider Trustee motion for dismissal | |
| and debtors answer. | 2 hr. |
| e. 1/19/10 objected to creditor Sandra Arocho claim as it lacks evidence | 1 hr. |
| docket 23. | |
| f. 2/10/10 attended hearing for conf. of plan; objection to claim;objection to | 2hr. |
| exemptions. A new 341 meeting was convened by Trustee to allow Sandra | |
| Arocho to document her claim and interrogate debtor. | |
| g. 2/18/10 read Banco Populares motion for relief from stay | 3/10 hr |
| h. 3/8/10 filed answer to Popular's lift of stay (docket 35) | 6/10 hr. |
| i. 3/11/10 filed an answer to bankruptcy Court order to show cause | 4/10 hr. |

- j. 3/23/10 attended preliminary hearing for lift of stay Banco Popular 1 hr.
- k. 4/14/10 filed amended schedule B to include photographip equipment 4/10 hr retained by debtor (docket 49)
- l. same date filed amended schedule F to include law suit filed by Sandra 3/10 arocho (docket 51). Total 10.6 hrs.

We have over 18 years of experience in bankruptcy practice so we feel that an hourly rate of \$200.00 per hr is warranted. The total comes to \$ 2120 amount that we would like to be paid from the funds already deposited. Since there are only \$806 left after deducting Trustees fees we ask to be paid \$806.

In support of his request for compensation the subscribing attorney submits;

a. the services rendered and expenses incurred are reasonable and necessary for the actual services provided. The time spent on each task is stated independently and is actual, necessary and are not excessive, redundant or unnecessary.

The rates charged are reasonable and customary and in line with the prevailing rate for attorneys with similar experience, skill, experience and reputation.

Notice; unless a party in interest objects in writing to this application for fees with the Clerk Bankruptcy Court with a copy to the undersigned within 20 days from the date of this motion, the same may be approved without further notice or hearing. If the party in interest has no objection then no further action is needed.

Counsel certifies that I have read this application; to the best of my knowledge this compensation conforms to the bankruptcy code, the federal rules of bankruptcy procedure and the local bankruptcy rules (2016-1); the rates that are being used are no less favorable to the debtor than those used in my private practice.

Whereas Counsel requests that this Court approves the present application for fees with any further order that is necessary.

I certify that on this date I presented the foregoing to the Clerk of the Bankruptcy Court for filing and upload via the ECM/CF system which will send notification to Trustee Alejandro Oliveras, Carlos G. batista attorney for Banco Popular; Jose L. Jimenez attorney for Sandra Arocho and the other attorneys that are members of the

ECM/CF system. The remaining creditors were notified as per the master address list by ordinary mail.

In Carolina, P.R. this Saturday, May 29, 2010.

s/Pablo E. Garcia Perez
PABLO E. GARCIA PEREZ
USDC 207705
Ave. Roberto Clemente,
Bloque 24 #58
Villa Carolina
Carolina, PR 00985
Tel/Fax: (787) 276-2750
E-Mail:
abogado00985@yahoo.com